

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

Investigation by the Department of Telecommunications
and Energy on its own motion pursuant to G.L. c. 159,
§§ 12 and 16, into Verizon New England Inc., d/b/a
Verizon Massachusetts' provision of Special Access
Services.

)
)
)
)
)
)
)

D.T.E. 01-34

**VERIZON MASSACHUSETTS'
SECOND SET OF INFORMATION REQUESTS TO WORLDCom, INC.**

Verizon New England Telephone Inc. d/b/a Verizon Massachusetts ("Verizon MA") requests that WorldCom ("WorldCom" or "Respondent") respond to the following information requests addressed to it or its witnesses. In the event responses to all or part of these requests will not be forthcoming in the time period established for this proceeding by the Department of Telecommunications and Energy ("Department"), kindly notify Verizon MA as soon as possible.

These requests shall be deemed continuing so as to require further and supplemental responses if WorldCom or its witnesses receive or generate additional information within the scope of these requests between the time of the original responses and the end of hearings in this proceeding.

All responses should conform to the specifications as given in the Definitions and Instructions, with respect to dates, documents, claims or privileges, etc.

If WorldCom feels that any request is ambiguous, please notify Verizon MA so that the request may be clarified prior to the preparation of a written response.

DEFINITION AND INSTRUCTIONS

1. With respect to each question, please state: (1) the name(s) and title(s) of the person or persons responsible for preparing the response; (2) the name(s) and title(s) of the person or persons who would be competent to testify concerning the response, whether or not that person will be called as part of the party's direct case in this proceeding.

2. In these Information Requests, "WorldCom" means WorldCom and its respective parents, subsidiaries, affiliates, agents, servants, attorneys, investigators, employees, ex-

employees, consultants, representatives and others who are in possession of, or who may have obtained information for or on behalf of any of the above mentioned persons or entities.

3. “Verizon” means Verizon New England, Inc. d/b/a Verizon Massachusetts.

4. The terms “document” and “documentation” are used in the broadest sense to mean all writings and records of every type, including without limitation, written, printed, typed or visually reproduced material of any kind, the original and all copies of any and all letters, reports, memoranda, files, communications, correspondence, agreements, bills, receipts, studies, analyses, telegrams, telexes, minutes, bulletins, instructions, literature, memoranda of conversations, notes, notebooks, diaries, data sheets, financial statements, work sheets, workpapers, pamphlets, plans, specifications, summaries, recordings, tapes, drawings, graphs, indexes, charts, telephone records, photographs, photographic records, computer files, whether or not such files are presently in a hard copy form, other data compilation, or any other written recorded, transcribed, punched, taped, filed or other graphic matter including any draft of the foregoing items and any copy or reproduction of any of the foregoing items upon which any notation, work figure, or form is recorded or has been made which does not appear on the original or as to whose existence, either past or present, the responding party has any knowledge of information. “Document” and “documentation” shall also mean copies of documents, notwithstanding that the originals thereof are not in the Respondent’s possession, custody or control, and all attachments to any document. In the event that documents containing the exact information requested do not exist, but documents do exist that contain portions thereof or which contain substantially similar information, then the definition of “documents” which are to be identified shall include the documents that do exist

6. If WorldCom cannot answer a request in full, please answer to the extent possible and state why the request cannot be fully answered.

7. If the WorldCom refuses to respond to any request by reason of a claim of privilege, please state the privilege claimed and the facts relied upon to support the claim of privilege.

8. Please serve a copy of the responses to these requests on Verizon MA’s attorney, Barbara Anne Sousa, 185 Franklin Street, Room 1403, Boston, Massachusetts 02110-1585, and Verizon’s Legal Specialist, Barbara Landry, 125 High Street, 11th Floor, Boston, Massachusetts 02110. Please make every effort to expedite delivery of responses to these requests, including email, shipping by Express Mail, UPS, Federal Express, Purolator Courier, or means of equal or greater speed.

INFORMATION REQUESTS

- 2-1 On page 8 of the Direct Testimony of Karen K. Furbish, it states that “CAP services are always priced lower than incumbent LECs’ Special Access services.” Please provide any and all documents in support of that statement as it relates specifically to Massachusetts.
- 2-2 On page 8 of the Direct Testimony of Karen K. Furbish, it states that “only about 10% of WorldCom’s ‘off-net’ requirements are met by other CAPs or CLECs.” Please provide any and all documents in support of that statement as it relates specifically to Massachusetts.
- 2-3 On page 4 of the Direct Testimony of Karen K. Furbish, it states that “a review of billing records from Verizon for the month of August 2001 indicates WorldCom pays monthly charges for a small number of intrastate special access circuits.” Please provide the Massachusetts bill relied upon in support of that statement and indicate the order numbers and circuit identifier (ID) numbers for each of the intrastate circuits to which Ms. Furbish refers.
- 2-4 Referring to page 11 of the Direct Testimony of Karen K. Furbish, please provide all relevant Texas PUC decisions and/or rulings in support of your statement that “measurements of interstate special access when used in lieu of UNEs [were added] to SBC’s local performance plan.” Also please identify the specific measurements required, and indicate whether the Texas PUC decision is final or subject to any pending petitions on reconsideration or appeal.
- 2-5 Referring to page 11 of the Direct Testimony of Karen K. Furbish, please provide all relevant Colorado regulatory commission decisions and/or rulings in support of your statement that measurements of interstate special access when used in lieu of UNEs would be added to Qwest’s local performance plan. Also please identify the specific measurements required, and indicate whether the Colorado Commission’s decision is final or subject to any pending petitions on reconsideration or appeal.
- 2-6 Referring to page 12 of the Direct Testimony of Karen K. Furbish, please provide all relevant decisions and/or rulings in support of your statement that “other states have determined that it is appropriate to monitor ILEC Special Access performance, including Minnesota and Washington.” Also, for each state, please identify the specific measurements required, and indicate whether the regulatory decision is final or subject to any pending petitions on reconsideration or appeal.
- 2-7 Referring to page 12 of the Direct Testimony of Karen K. Furbish, please explain fully the basis for your statement that “several other states are actively considering requiring BOCs to report on Special Access performance, including Indiana, Illinois, Tennessee, Georgia, and Maine.” Please provide any and all documents upon which you relied in support of that statement.

- 2-8 Referring to page 13 of the Direct Testimony of Karen K. Furbish, please indicate when WorldCom began reporting its special services performance results on a wholesale and retail basis in New York in compliance with the New York PSC's December 20, 2001, order applying the Special Services Guidelines to all carriers. If WorldCom has not yet filed such performance reports, please indicate when it intends to do so.
- 2-9 Referring to page 13 of the Direct Testimony of Karen K. Furbish, please explain fully the basis for your statement that there is "evidence of [Verizon's] favorable treatment of its retail customers over its wholesale competitor carrier customers," as it relates to specifically to Massachusetts. Also please provide all documents and identify all specific facts upon which you relied in support of your statement for Massachusetts.
- 2-10 On page 14 of the Direct Testimony of Karen K. Furbish, it states that the Department "can request the FCC to fully investigate Verizon's performance, or delegate to the Department full authority to devise appropriate enforcement mechanisms." Please indicate whether the FCC has granted such authority to any state commission, including but not limited to New York, regarding interstate special access services.

Respectfully submitted,

VERIZON MASSACHUSETTS

By its attorney,

Barbara Anne Sousa
185 Franklin Street, Room 1403
Boston, Massachusetts 02110-1585
(617) 743-7331

Dated: February 14, 2002